



**Chairperson: Bob Wyatt, NW Natural**  
**Treasurer: Fred Wolf, Legacy Site Services for Arkema**

July 01, 2010

David Farrer, PhD  
Environmental Health Assessment Program  
Office of Environmental Public Health  
Oregon Division of Public Health  
800 NE Oregon St., Suite 640  
Portland, OR 97232

Re: Portland Harbor Superfund Site Recreational User Health Assessment

Dear Dr. Farrer:

The Lower Willamette Group (LWG) appreciates the opportunity to review the Recreational User Public Health Assessment (PHA) and provide comments. We recognize the important role of the Oregon Department of Human Services/Environmental Health Assessment Program (ODHS/EHAP) in the Superfund process, as it provides health assessment information to the community.

The PHA provides valuable information to the community about potential health risks at the Portland Harbor Superfund Site. As you are aware, in parallel to your process, EPA is responsible for the protection of human health from chemical releases at the Portland Harbor Superfund Site and will use the Draft Human Health Risk Assessment (HHRA) prepared by the LWG as one of several tools to establish cleanup goals and evaluate sediment cleanup alternatives that will protect human health at the Portland Harbor Site.

While the PHA and HHRA serve different purposes at the Superfund site, the LWG is pleased that the documents are consistent in their approaches and findings. The PHA evaluated the same exposure pathways and exposed populations for direct contact with sediment and surface water as the HHRA. For the majority of the exposure factors, the PHA used the same assumptions as the HHRA, including recommendations from EPA.

The PHA addresses two primary issues related to recreational user health risks in the Portland Harbor Area. The LWG makes the following observations on these important issues:

1. The PHA concluded that "swallowing or touching chemical contaminants in water, beach sediment, and bottom sediment are not expected to harm the health of people who recreate or work within the Portland Harbor Superfund Site," which is consistent with the HHRA's conclusion that direct contact with sediment and surface water are not risk drivers at the site.
2. The PHA addresses bacterial contamination in the river as a health risk. The HHRA does not assess this type of risk, and we appreciate the PHA's unique role in this risk assessment conclusion.

As with the PHA, the HHRA concludes that eating resident fish is the main health risk from chemical contamination at the site.

The next step for EPA and the LWG is to apply the conclusions of the HHRA to the feasibility study process, which examines prudent ways to reduce health risks from chemical contamination through cleanup options.

The LWG looks forward to our continued cooperation with ODHS/EHAP, EPA and the community in ensuring a greater understanding of human health risks in the Portland Harbor Superfund Site.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Bob Wyatt', with a stylized flourish extending to the right.

Bob Wyatt  
Chair

Cc: U.S. Environmental Protection Agency  
Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Grand Ronde Community of Oregon  
Confederated Tribes of Siletz Indians of Oregon  
Confederated Tribes of the Umatilla Indian Reservation  
Confederated Tribes of the Warm Springs Reservation of Oregon  
Nez Perce Tribe  
Oregon Department of Fish & Wildlife  
United States Fish & Wildlife  
Oregon Department of Environmental Quality